



Form ADV Part 2A

Version date: March 30, 2023

This brochure provides information about the qualifications and business practices of Axiom Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (603)429-0626. The information in this brochure has not been verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Axiom Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Axiom Advisors, LLC is 136305.

Axiom Advisors, LLC

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Bedford, NH 03110

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www.axiom123.com

Item 2: Material Changes

This brochure is designed to provide information about the firm, its practices, and its personnel. Material updates to the information contained within this brochure will be provided to clients on an immediate basis. This section will be updated to reflect such material changes in a summary form.

Should you have any questions related to this brochure, please contact a firm representative at your convenience.

The material changes in this brochure from the last annual updating amendment Axiom Advisors, LLC on 02/19/2022 are described below. Material changes relate to Axiom Advisors, LLC's policies, practices or conflicts of interests.

- Item 4 has been amended to reflect the change in ownership from David M. Wheat to Brian E. Conway.
- Item 5 has been amended to adjust the hourly fees for financial planning.

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Item 4: Advisory Business

Axiom Advisors, LLC ("Axiom") is an independent, registered investment advisor with its primary office in Bedford, New Hampshire.

Axiom was founded in 2005 by David M. Wheat. Sole ownership of the firm transferred to Brian E. Conway in 2022. Brian E. Conway is the President and Chief Compliance Officer for Axiom. The firm is a fee-only financial planning and consulting business and is dedicated to the fiduciary principle that the client's best interests are always paramount.

Financial Planning and Consulting Services

Axiom offers comprehensive financial planning to affluent individuals. This process begins with an initial complementary consultation during which the services provided by Axiom are explained. Axiom utilizes a cash flow-based approach to long term financial planning. This entails identifying all a client's financial resources and matching them against the client's cash flow needs.

The firm and the client enter into an agreement for services. Detailed information about the client's personal finances, history and values are gathered for the plan. Axiom may conduct follow-up interviews, as needed, for the purpose of reviewing, confirming and collecting additional financial data. Based on this information, a preliminary plan is prepared for presentation.

Financial plans are based on the client's personal mission, vision, values and goals, as well as their financial situation at the time the plan is presented. Clients are advised that certain assumptions are made with respect to investment returns and inflation rates based on historical and economic data. Past performance is in no way an indication of future performance. Axiom does not offer any guarantees or promises that the client's financial goals and objectives will be met. It is critical that if there is a change in a client's financial situation, goals, objectives, or needs, Axiom needs to be notified promptly.

Financial planning is a process, not an event. The process is dependent on an open and honest communication between an advisor and a client. Our firm can guide the client in implementing the plan recommendations and provide on-going consulting regarding the management of their financial resources.

As of December 2022, Axiom does not manage any assets under management.

Item 5: Fees and Compensation

Financial Planning and Consulting Services

Financial planning services are generally provided on a fixed fee basis, and can range from \$600 to \$25,000, depending upon the scope and complexity of the services requested. All services are rendered according to the terms and conditions of the client agreement.

Please note: Axiom requires immediate payment of an initial deposit of \$500. The balance of the fee is due upon the presentation of the written financial plan.

Axiom may provide financial planning or consulting services on an hourly basis. The hourly rate for such services is \$200- \$625. Administrative work is billed out at an hourly rate of \$65.

Clients charged an hourly fee are billed on a monthly basis. All fees remain negotiable and are at the sole discretion of the firm.

Item 6: Performance-based fees and Side-by-Side Management

Axiom's investment advice does not extend to the management of Private Funds. The firm's offerings are limited to financial planning and/or consulting on behalf of individual clients. Where advisers manage Private Funds in addition to portfolio management services, the potential for a conflict of interest is magnified, particularly where the firm may have an incentive to favor those accounts charged a performance fee.

As Axiom's advisory services do not incorporate the implementation of any performance fees or the offer of any additional investment-related services, side-by-side management does not apply to those services rendered by the firm. The firm strongly encourages clients to review this disclosure brochure in its entirety.

Item 7: Types of Clients

Comprehensive Financial Planning:

Axiom's financial planning and consulting services are generally provided to affluent individuals. Although there are no restrictions placed on clients as to minimum account size, the firm does require immediate payment of an initial deposit of \$500. Comprehensive planning services are also offered on a subscription basis, enabling clients to pay for planning advice on a monthly or quarterly basis. A client's services agreement with Axiom is non-assignable without the client's written approval.

Success Track:

Success Track is an innovative financial coaching program offered by Axiom Advisors on a subscription basis. This program provides the client with a comprehensive internet based financial planning center. This system provides a state-of-the-art financial dashboard in which all personal financial data is compiled and updated daily. Success track subscribers will have access to periodic coaching calls and tools to guide their decision-making process.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss

Every individual has a different risk profile. However, risk is not limited to market fluctuations. If a client's resources do not appreciate at a rate greater than their need, they run the risk of exhausting the resources. When an Axiom representative evaluates implementation of a plan, they focus on three questions:

1. Are the resources adequate to meet the stated need?

2. Are the resources positioned appropriately to meet the need at a reasonable risk suitable to the client; and,
3. From which resource are current needs to be met.

Every client has short-term, mid-term, and long-term needs. Each need should have a distinct risk characteristic and tolerance. These are blended to create an overall portfolio design based on:

- Time—when will the resource be needed?
- Need—how much will be needed?
- Tolerance—what level of volatility is appropriate for the client and the need.

It is all about cash flow. Resources are needed to generate cash flow to meet needs.

Item 9: Disciplinary Information

The firm and its management personnel are not the subject of any disciplinary, regulatory, criminal, civil, or otherwise reportable history.

Item 10: Other Financial Industry Activities and Affiliations

Axiom Advisors IAR's act as fiduciaries for their clients. This means that they are bound legally and professionally to act in the best interest of their clients always. In order to offer comprehensive implementation, firm representatives maintain separate licenses and registrations as:

- Registered Representatives of Cambridge Investment Research, Inc., a FINRA registered broker/dealer.
- Investment Adviser Representatives of Cambridge Investment Research Advisors, Inc., a SEC registered investment adviser (combined "Cambridge").
- Various Insurance Companies

Through this arrangement, and in consideration for the business placed through Cambridge, the representatives are subject to the receipt of additional advisory fees and transaction-based commissions. As planning recommendations lead to action that requires products and services which impact an IAR's income, this represents a conflict of interest. Therefore, advisory fees are disclosed to the client prior to choosing an investment.

The firm representatives are also subject to additional commission-based compensation for their work as licensed insurance brokers representing of various insurance providers. Such products may be recommended to advisory clients, to augment the plan based on the clients' overall needs and objectives. Axiom's insurance offerings are offered to advisory clients solely as an additional service. Clients are under no obligation regarding such offerings.

While Axiom and Cambridge do maintain a business relationship, the two firms are not affiliated by way of corporate control. Each firm remains independently owned and operated. Because Axiom IAR's receive compensation from Cambridge this represents a conflict of interest.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

For their own personal accounts, firm personnel may purchase and/or sell products that they have similarly recommended to clients. Where such activity presents the potential for conflict of interest, the firm has adopted a Code of Ethics which governs the firm's basic policies of ethical conduct. The Code is designed to provide firm personnel with some assurance that any conduct deemed in violation of the client's best interest will be met with swift disciplinary action.

Accordingly, personal securities transactions may be made, but only where such trades do not interfere with those interests of a client. The firm maintains records of personnel securities holdings and regularly monitors transaction-based activity for any deviation from the Code. A copy of the Code of Ethics is available by request.

Item 12: Brokerage Practices

Axiom does not maintain any soft-dollar arrangements.

Item 13: Review of Accounts

Financial plans will be reviewed and updated at least annually. Clients are urged to inform Axiom of any changes in objective or financial situation on an immediate basis.

Item 14: Client Referrals and Other Compensation

Axiom does not compensate others for client referrals and receives no undisclosed compensation for referrals to third parties.

Items 15 & 16: Custody & Investment Discretion

Due to the nature of its business offerings, Axiom does not exercise any discretionary authority over client accounts. Through their registration as Investment Advisor Representatives of Cambridge Investment Research Advisors, Inc., Axiom Advisor Representatives exercise discretion with a client's written approval.

Item 17: Voting Client Securities

Axiom does Financial Planning Only and does not vote, nor advise clients how to vote proxies for securities.

Item 18: Financial Information

Under Rule 206(4)-4 of the Investment Advisers Act of 1940, investment advisers are required to disclose certain information about their business practices that might serve as material to the client's decision in choosing an investment adviser.

Axiom is not subject to any financial hardships or other conditions that might impair its ability to meet its contractual obligations to clients. Where the firm does require the prepayment of certain fees, such fees are in the form of a deposit for financial planning

services which are then rendered shortly thereafter.

Item 19: Officers and Management Personnel

All affiliated persons that develop and provide financial plans and/or consulting on the behalf of Axiom must be registered as an investment advisor representative. Such representatives must meet the appropriate qualifications for registration and have at least five years of business experience or a college degree. Please refer to Part 2B of this brochure for further information with respect to firm personnel.

Axiom Advisor Representatives are required to act as fiduciaries for their client's affairs. This means the adviser must hold the client's interest above its own in all matters. The Securities and Exchange Commission (SEC) has stated that an advisor has a duty to:

- Make reasonable investment recommendations independent of outside influences.
- Select broker-dealers based on their ability to provide the best execution of trades for accounts where the adviser has authority to select the broker-dealer.
- Make recommendations based on a reasonable inquiry into a client's investment objectives, financial situation, and other factors.
- Always place client interests ahead of their own.

Miscellaneous

Privacy: the firm prohibits the disclosure of any client related information to third parties except in furtherance of the client/firm business relationship or as otherwise provided by law.

Business Continuity: In the event of a disruption in the normal course of business, Axiom has adopted a business continuity plan to assist with the recovery of business operations.

FORM ADV Uniform Application for Investment Adviser Registration
Part 2B: Brochure Supplements
Investment Adviser Representatives and/or Supervised Persons: Supplemental information
Item 1: Cover Page

Axiom Advisors, LLC

Firm CRD #136305
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This brochure provides information about the qualifications and business practices of these representatives as investment adviser representatives of Axiom Advisors, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.

The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.

Additional information about the firm and its representatives is also available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Educational Background and Business Experience

Name & Title: Brian Conway, President, Chief Compliance Officer, Investment Advisor Representative

Year of Birth: 1967

Education:

Clarkson University, B.S. Engineering and Management, 1989

Northeastern University, Coursework in Mechanical Engineering, 1990-1992

Licenses/Professional Designations:

- Certified Financial Planner, The Certified Financial Planner Board of Standards, 2008
- Certified Fund Specialist, The Institute of Business and Finance, 2004
- Retirement Management Advisor (RMA), Investments & Wealth Institute, 2015; Series 7 and 66 examinations

CRD# 4606233

Business Background:

- Axiom Advisors, LLC, President and Manager, January 2020 - Present
- Axiom Advisors, LLC, Chief Compliance Officer, 2018-2020 and January 2022 - Present
- Axiom Advisors, LLC, Investment Advisor Representative, July 2005 - Present
- Cambridge Investment Research, Inc., Registered Representative, October 2005 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, July 2010 - Present
- State Mutual Corp., Registered Representative, 2003 - 2005
- State Mutual Companies/Allmerica Financial/Veravest, Inc., Insurance Agent and Registered Representative, 2002 - 2003
- United Equipment Technologies, Director, 2000 - 2002
- United Equipment Technologies, Domestic and International Sales Manager, 1993 - 2000

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Brian Conway. Axiom has no information to disclose in relation to this item.

Other Business Activities:

None

Name & Title: Stuart J Bronson, Investment Advisor Representative

Year of Birth: 1962

Education:

California State Polytechnic University Pomona, CA, 1981

University of Arizona, B.A. Ecology and Evolutionary Biology, 1982-85

Licenses/Professional Designations:

- Accredited Investment Fiduciary (AIF), Center for Fiduciary Studies, 2015; Series 6, 63, 7 examinations

CRD# 2737384

Business Background:

- Axiom Advisors, LLC, Investment Advisor Representative, February 2014 - Present
- Cambridge Investment Research, Inc., Registered Representative, November 2013 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, November 2013 - Present
- MML Investors Services, LLC, Investment Advisor Representative, 1998 - 2013
- MML Investors Services, LLC, Registered Representative, 1996 - 2013

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Stuart J. Bronson. Axiom has no information to disclose in relation to this item.

Other Business Activities:

None.

Supervision:

Brian Conway is responsible for the supervision of Axiom affiliates and their activities on behalf of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any affiliate should be directed to Brian at (603) 429-0626.

Name & Title: Jeremy W. Benoit, Investment Advisor Representative

Year of Birth: 1970

Education: University of Vermont, B.S. in Small Business Management, 1992

Licenses/Professional Designations:

- Chartered Retirement Planning Counselor, College for Financial Planning, 2006, Series 6, 7, 24, 63, and 65 examinations.

CRD# 2277073

Business Background:

- Axiom Advisors, LLC, Investment Advisor Representative, April 2018 - Present
- Cambridge Investment Research, Inc., Registered Representative, November 2017 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, November 2017 - Present
- Lincoln Financial Securities Corp., Investment Advisor Representative, 2006 - 2017
- Lincoln Financial Securities Corp., Registered Representative, 2006 - 2017
- Jefferson Pilot Securities Corp., Investment Advisor Representative, 2002 - 2006
- Jefferson Pilot Securities Corp., Registered Representative, 2002 - 2006
- Signature Investor, Inc., Registered Representative, 1992 - 2002

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Jeremy Benoit. Axiom has no information to disclose in relation to this item.

Other Business Activities:

None.

Supervision:

Brian Conway is responsible for the supervision of Axiom affiliates and their activities on behalf of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any affiliate should be directed to Brian at (603) 429-0626.

Name & Title: Donna M. Rivera, Investment Advisor Representative

Year of Birth: 1956

Education:

Northeastern University, Bachelor of Science- CJ, 1977, 1978
Suffolk University, Law, 1976, 1977,
North Shore Community, Assoc. Degree-Law Enforce, 1974, 1976

Licenses/Professional Designations:

- Certified Financial Planner, The Certified Financial Planner Board of Standards, 1988. (CFP), Series 7, 22, 63 and 65 examinations.

CRD# 1048043

Business Background:

- Axiom Advisors, LLC, Investment Advisor Representative, April 2018 - Present
- Cambridge Investment Research, Inc., Registered Representative, November 2017 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, November 2017 - Present
- Lincoln Financial Securities Corp., Investment Advisor Representative, 2006 - 2017
- Lincoln Financial Securities Corp., Registered Representative, 2006 - 2017
- Jefferson Pilot Securities Corp., Investment Advisor Representative, 2000 - 2006
- Jefferson Pilot Securities Corp., Registered Representative, 2000 - 2006

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Donna M. Rivera. Axiom has no information to disclose in relation to this item.

Other Business Activities:

None.

Supervision:

Brian Conway is responsible for the supervision of Axiom affiliates and their activities on behalf of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any affiliate should be directed to Brian at (603) 429-0626.

Name & Title: Paul S. Como, Investment Advisor Representative

Year of Birth: 1974

Education:

Bentley College, BS in Management, 1997

Licenses/Professional Designations:

- Chartered Retirement Planning Counselor, College for Financial Planning, 2008, Series 6, 62, 63 and 65 examinations.

CRD# 2944437

Business Background:

- Axiom Advisors, LLC, Investment Advisor Representative, January 2018 - Present
- Cambridge Investment Research, Inc., Registered Representative, November 2017 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, November 2017 - Present
- Bernard M. Sullivan Insurance Agency, Inc., VP, January 2018 - Present
- Institution for Savings, Newburyport, MA, Corporator, 2011 - Present
- Anthony and Malcolm Insurance Agency, Inc., Agent, April 2017 - December 2017
- Lincoln Financial Securities Corp., Investment Advisor Representative, 2006 - 2017
- Lincoln Financial Securities Corp., Registered Representative, 2006 - 2017
- Bernard M. Sullivan Insurance Agency, Inc., Manager, 2004 - 2017
- Jefferson Pilot Securities Corp., Investment Advisor Representative, 2004 - 2006
- Jefferson Pilot Securities Corp., Registered Representative, 2004 - 2006

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Paul S. Como. Axiom has no information to disclose in relation to this item.

Other Business Activities:

Paul S. Como is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Axiom, always acts in the best interest of the client, including in the sale of commissionable products to



advisory clients. Clients are in no way required to implement the plan through any representative of Axiom, in their capacity as a licensed insurance agent.

Paul S. Como is a Manager of Bernard M. Sullivan Insurance Agency, Inc. From time to time, he will offer clients advice or products from this activity. Axiom always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Axiom in such individual's outside capacity.

Paul S Como is Corporate for the Institution For Savings a local bank based in Newburyport, MA. From time to time, he will offer clients advice or products from this activity. Axiom always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Axiom in such individual's outside capacity.

Supervision:

Brian Conway is responsible for the supervision of Axiom affiliates and their activities on behalf of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any affiliate should be directed to Brian at (603) 429-0626.

Name & Title: Elizabeth A Benoit, Investment Advisor Representative

Year of Birth: 1987

Education:

Concentration of Finance Business, Southern New Hampshire University – 2010

Licenses/Professional Designation:

- Series 6,7, 63 and 65 examinations.

CRD# 5972405

Business Background:

- Axiom Advisors, LLC, Investment Advisor Representative, August 2021 - Present
- Cambridge Investment Research, Inc., Registered Representative, November 2017 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, November 2017 - Present
- Candia Woods Golf Links, Bartender, May 2006 - Present
- Cyndie Barone & Associates, Tax Preparer, July 2012 - Present
- Lincoln Financial Securities Corp., Investment Advisor Representative, March 2017 - November 2017
- Lincoln Financial Securities Corp., Registered Representative, March 2017 - November 2017
- Financial Strategies Retirement Partners/Commonwealth, Client Services, 2014 - 2017
- Red Boat Advisor, Administrative, 2011 – 2012

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Elizabeth A. Benoit. Axiom has no information to disclose in relation to this item.

Other Business Activities:

Elizabeth A Benoit is a licensed insurance agent. From time to time, she will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Axiom always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any Axiom representative in such individuals outside capacities.

Elizabeth A Benoit is a tax preparer Cyndie Barone & Associates.



Elizabeth A Benoit is a bartender at Candia Woods Golf Links.

Supervision:

Brian Conway is responsible for the supervision of Axiom affiliates and their activities on behalf of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any affiliate should be directed to Brian at (603) 429-0626.

Name & Title: Elizabeth T Hodgdon, Investment Advisor Representative

Year of Birth: 1977

Education:

B.S. Fisheries and Wildlife, Michigan State University – 1999

Licenses/Professional Designation:

- Chartered Mutual Fund Counselor (CMFC). Series 6, 63 and 65 examinations.

CRD# 4147008

Business Background:

- Axiom Advisors, LLC, Investment Advisor Representative, May 2022 - Present
- Cambridge Investment Research, Inc., Registered Representative, January 2020 - Present
- Cambridge Investment Research Advisors, Inc., Investment Advisor Representative, January 2020 - Present
- MML Investors Services, LLC, Investment Advisor Representative, 2017 - 2019
- MML Investors Services, LLC, Registered Representative, 2000 - 2006 and 2012 - 2019

Disciplinary Information:

Axiom Advisors, LLC is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Elizabeth T. Hodgdon. Axiom has no information to disclose in relation to this item.

Other Business Activities:

Elizabeth T Hodgdon is an owner of one residential rental property in Penacook, NH

Supervision:

Brian Conway is responsible for the supervision of Axiom affiliates and their activities on behalf of the firm. This supervision extends to reviewing their business practices and monitoring the advice given to clients. Questions related to the activities of any affiliate should be directed to Brian at (603) 429-0626.